

Honorable Julius Genachowski, Chairman
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker,

As an employee of a Sorenson Communications, a Video Relay Service (VRS) provider, I have the great fortune of assisting deaf individuals to communicate by videophone in American Sign Language using VRS. I have seen first-hand that this life-altering broadband service is a vital link that connects deaf people to the hearing community.

I have been with Sorenson for over 4 years, and in that time I have moved up from the ground floor and been given continuing opportunities to help the deaf community. Sorenson employs thousands of people across the nation and is one of the largest employers of the deaf. Sorenson assist tens of thousands of deaf individuals across the country with their communication needs. Sorenson has also given back to the local community in Utah by providing hundreds of jobs within Price, a community that needed help after the mine was shut down.

Sorenson invests in their employees and in their customers. Sorenson was the first VRS provider to develop and provide, at no cost to the deaf, a videophone. This allowed the deaf to communicate in their native language, ASL, with an interpreter who then voiced for them on the phone. These videophones were installed throughout the nation to every deaf individual that could afford broadband access. A second videophone was designed, developed, and deployed to customers, again at no costs, to further the functional equivalency of the VRS service for the deaf. Ensuring that deaf individuals have access to VRS and encouraging improvements in VRS should be a high priority for America and the FCC. The Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide ?functionally-equivalent? communications.

The FCC will soon determine the future of VRS. When you set the VRS rate, this will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access and inclusion ? or force deaf users to revert to TTY communications, an ancient technology. And, it will determine whether VRS fulfills its potential to drive broadband adoption by the deaf, even

in the face of poverty and isolation.

I was deeply disturbed to see the Federal Communication Commission's recent Public Notice on VRS rates. These rate proposals would put an end to VRS as we know it. My employer has already informed me that if these proposed rates are adopted, our company would head into bankruptcy.

These rates were set off of "allowed costs" that are set forth by the FCC, and because of this the FCC has chosen to penalize the most efficient provider by cutting their rate in half while allowing the other smaller providers with much higher costs to be awarded for their inefficiencies. These "allowed costs" do not take into account the millions of dollars the Sorenson has invested in the hardware videophones, distribution, education, etc. for the deaf communities. Sorenson is the only provider that is distributing hardware videophones to further achieve functional-equivalent communications for our customers, and the FCC wishes to penalize us for it.

If Sorenson Communications were to bankrupt because of the proposed reimbursement rates sets by the FCC the following would occur:

- As Sorenson Communications is the largest VRS provider, the VRS industry would buckle under the strain of accommodating the amount of calls that Sorenson was processing and the industry would come to a halt.
- Thousands of deaf individuals would lose their ability to place phone and 911 calls overnight. Family and friends of these individuals would lose their ability to contact their loved ones.
- Thousands within America would lose their jobs, including hundreds of jobs within Salt Lake City and Price. This would occur in an economy where finding a new job would be extremely difficult, if not impossible.

The FCC should be increasing the availability and use of VRS, not cutting back. I ask for you to adopt a rate that encourages continuing improvements in VRS technology and continues to improve services levels. Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, a larger and better-trained pool of interpreters and better videophones with an array of enhanced features. Monthly payments for broadband are a big expense for many deaf people, and instead of trying to cut back on VRS, we should be exploring ways to make VRS over broadband more affordable to deaf individuals. Progress towards functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available.

VRS is a recent and dramatic advancement that benefits those who are deaf, but so much more can be done. It would be tragic if the FCC were to destroy this broadband service that is so vital to the deaf.

I ask of you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest in improving VRS and reaching more deaf individuals. The law requires it and it is the right thing to do.

Sincerely,
Richard Simmons